UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA

| ALEX HIXON, |) |
|---|-----------------------------|
| Plaintiff, |) |
| v. |) No. 1:19-cv-00120-CLC-SKL |
| TENNESSEE VALLEY AUTHORITY BOARD OF DIRECTORS, |))) |
| Defendant. |) |

OBJECTIONS TO DEFENDANT'S EXHIBIT LIST

Comes Plaintiff, through counsel, pursuant to Fed.R.Civ.P. 26(a)(3)(B), and hereby sets forth his objections to Defendant's exhibit list (Doc. 61) as follows:

| EXHIBIT | EXHIBIT DESCRIPTION | BASIS FOR OBJECTION |
|---------|---------------------------------------|--------------------------------------|
| NO. | | |
| 10 | 4/25/05 Letter with Return to Work | FRE 402, FRE 403 |
| | Conditions | |
| 17 | EEO Counselor's Report | FRE 802, FRE 402, FRE 403 |
| 18 | EEO Complaint | FRE 802, FRE 402, FRE 403 |
| 32 | Random Alcohol and Drug Testing | FRE 802, FRE 402 |
| | Memo of Understanding | |
| 33 | Hixon Medication List | Duplicative of Ex. 27 |
| 34 | Email from Shahan to Cofer and Ortiz | FRE 802 |
| | dated 5/30/14 | |
| 35 | Email from Shahan to Walls and Cofer | FRE 802 |
| | dated 5/30/14 | |
| 36 | Email from Ortiz to Shahan dated | FRE 802 |
| | 5/30/14 | |
| 38 | Email from Ortiz to Shahan dated | FRE 802 |
| | 5/22/14 | |
| 40 | Dr. C. Adams patient file for Hixon | FRE 402, FRE 403, cumulative |
| 41-42 | Dr. Glover counseling notes for Hixon | FRE 402, FRE 403, cumulative |
| 43 | Dr. Sowell patient file for Hixon | FRE 402, FRE 403, cumulative, Motion |
| | | in Limine (Doc. 52) |
| 44-59 | Social Security files and related | FRE 402, FRE 403, cumulative, Motion |
| | documents | in Limine (Doc. 50) |
| 60 | Dr. Giorgadze notes | FRE 402, FRE 403, FRE 802 |

| Dr. Brickman Psych Evaluation | | | |
|---|---------|--|--------------------------------------|
| FRE 402, FRE 403, FRE 802, Motion in Limine (Doc. 50) | 61 | Dr. Brickman Psych Evaluation | FRE 402, FRE 403, FRE 802, Motion in |
| Limine (Doc. 50) | | | |
| 63 Parkridge Valley Hospital records FRE 402, FRE 403, FRE 802 64 Powell – EAP session notes FRE 402, FRE 403, FRE 802 76-77 2005 FFD documents FRE 402, FRE 403, cumulative 78-81 2013 FFD documents FRE 402, FRE 403, cumulative 82-85 2005 FFD documents FRE 402, FRE 403, cumulative 86 1/4/05 Letter from Mahan to Ortiz FRE 402, FRE 403, FRE 802 87 12/3/04 Letter from Dr. Lilly to Ortiz FRE 402, FRE 403, FRE 802 88-89 Letters from and to Moreno FRE 402, FRE 403, FRE 802 96 Medication list Duplicative of Ex. 27 100 Dronabinol Microdex FRE 402, FRE 403, FRE 802; this document was pulled or accessed on 4/21/15 101 Dronabinol Drug Information FRE 402, FRE 403, FRE 802; this document was pulled or accessed on 4/21/15 102-103 Documents related to Dr. Charles Adams lawsuit FRE 402, FRE 403, Motion in Limine (Doc. 54) 104 Medical Review Officer Manual FRE 802 105 Hixon's Prescription Lists FRE 802 109-149 Dr. Glover progress notes FRE 402, FRE 403, cumulative 151 | 62 | Dr. Mullady Evaluation | |
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| cumulative | 193-199 | FFD documents Oct. 2012 – Jan. 2013 | |
| 236 5/16/14 Email from Ortiz to Cofer FRE 802 | | | |
| | 236 | 5/16/14 Email from Ortiz to Cofer | FRE 802 |

Respectfully submitted,

MIKEL & HAMILL PLLC

By: s/ Doug S. Hamill

Doug S. Hamill, BPR No. 22825 Attorney for Plaintiff 620 Lindsay Street, Suite 200 Chattanooga, TN 37403 (423) 541-5400 dhamill@mhemploymentlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of November, 2020, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

By: s/ Doug S. Hamill